

RECEIVED

JUN 16 2020

APPELLATE  
OF THE  
STATE OF ALASKA

FILED

JUN 15 2020

APPELLATE COURTS  
OF THE  
STATE OF ALASKA

Mark N. Wayson  
66063 S. Glacier Park Rd.  
Sutton, Alaska 99674  
(907) 746-4570  
markonwayson@yahoo.com

IN THE SUPREME COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT

MARK N. WAYSON,

Petitioner

v.

WILLIAM E. STEVENSON,

Respondent

No. S-17270

6/18/20  
REFUSED FOR FILING

This petition for review  
matter in S-17270 is  
closed. No appealable  
or reviewable court order  
was provided. I am  
enclosing an attorney  
grievance form to be

completed and submitted  
to the Alaska Bar Association.  
Ryan Montgomery - State  
Chief Deputy Clerk

cc: P. Waggoner

**MOTION FOR THIS COURT TO ORDER A CRIMINAL INVESTIGATION OF PAUL  
W. WAGGONER FOR PERJURY AND THEFT BY DECEPTION**

Mark N. Wayson (hereinafter 'Wayson') requests that this Court order an immediate criminal investigation of perjury, in violation of Chapter 11 Alaska Statutes, committed by attorney Paul W. Waggoner, (hereinafter 'Waggoner') who used your Court as the forum for the commission of his crime.

Waggoner, then practicing law for Richmond & Quinn of Anchorage, Alaska, like all lawyers permitted to practice law in Alaska, swore an oath to never mislead the Courts in any matter of fact or law in order to be admitted to the Alaska Bar Association. (hereinafter 'ABA') (Exh. 1, ABA Sworn Oath)

Practically, as soon as any lawyer has taken this oath, he/she is then welcomed into the ABA, and allowed to go forth and begin perjuring themselves for profit by misleading the courts in both matters of fact and of law. There is no greater indignity to the legal system, and the public it serves, than this Court overseeing a legal system that has been corrupted into serving lawyers before justice for Alaskans, under this Court's reliance on a centuries-old medieval common law that spawned the 'Absolute Privilege'.

Under this medieval umbrella, Waggoner perjured himself to the detriment of the public administration of Justice, and for his personal financial gain. Waggoner perjured himself to damage Wayson's credibility with this Court. In the ultimate contempt of Court possible, Waggoner damaged the dignity of, and respect for, the Courts by defaming Wayson, a member of the public, that all Courts are mandated to 'serve' as public servants, not to defame.

As the highest court in Alaska, you have betrayed the sacred trust that the public entrusted to you. You have hijacked truth and due process intended to safeguard the people you serve. This Court is not in place to act as the collective CEO for liars in the ABA.

This Court has pimped out those same principles to your ABA colleagues to weaponize as tools against non-lawyers with lies, filth, deceit and defamation that has become the prevailing 'practice of civil law' in Alaska and that guarantees obscene profits to your colleagues. They say a few bad apples will spoil a batch. In this case, a few good ABA apples can never ripen the mess that you have allowed the legal system to become. Waggoner built his Opposition to Wayson's Interlocutory Petition for Review upon a false claim accusing Wayson of defrauding

the public by requesting public assistance that Wayson is not entitled to. This was/is a bare-faced lie.

Waggoner was fully aware, as is this Court, that there was never a request for public assistance by Wayson. This Court has Waggoner's perjury preserved as evidence on file because this Court denied Wayson's request to strike from the record, this particular 'privileged' defamatory discharge from Waggoner.

Unless this Court is complicit in Waggoner's perjury, and his theft by deception that enabled Waggoner to be 'paid' for the perjury, this Court's obligation to the people, ethically and morally, is to order a criminal investigation under Wayson's constitutionally guaranteed equal protection under the law. ABA membership places no lawyer or judge above the law.

Neither the U.S. nor the Alaskan Constitutions are trumped by the 600-year-old Absolute Privilege, although the lower courts supervised by this Court have routinely found that crimes like Waggoner's, when committed by lawyers, are allowed under the Absolute Privilege. Waggoner was aware therefore that his lies would play well in this Court. So far they have.

Perjury, threats to witnesses, threats to federal officers, the inciting of deadly violence against Wayson, the alteration of public records and other criminal offenses, are permitted as litigation tools in the Superior Court, as long as all of these are committed by a litigant who must hire a surrogate from the ABA to 'commit' the offenses for him/her through an Alaskan court.

Waggoner is no different than any other suspect/defendant who commits a crime, whether at a 7-11 convenience store or in a Court of Law.

This Court is no different than any other entity or person who acts as an accessory to a statutorily designated criminal offense, whether committed at the 7-11, or in a Court of Law.

Waggoner himself has recently provided evidence of his theft by deception in his Attorney Fees billing records. On or about November 5, 8, 14, 15, and 18, of 2018, and on or about December 6 and 7, of 2018, Waggoner, directly through this Court, did steal by deception, a combined \$3,600.00 in attorney fees for a service he did not perform. Waggoner knew there was no request for public assistance, and therefore he knew his claim and billing were false. (Exh. 2, pp. 054, 055, December 21, 2018 Richmond & Quinn Attorney Fees billing records, and p. 057, January 17, 2019 Attorney Fees billing records.)

Wayson advises this Court that prior to filing this motion requiring the Court to step up if the Court actually has an impartial forum as it advertises, Wayson attempted to get Rob Richmond's assistance, of Richmond & Quinn, after his offer to help. Wayson requested that Richmond himself man-up and act ethically to deal with Waggoner's offenses.

Wayson also requested that Richmond address a number of double and fraudulent billings by his firm. (Exh. 3, one June 1, 2020, Wayson-Richmond E-mail, three May 18, 2020, Wayson-Richmond E-mails, and one February 24, 2020, Wayson-Richmond E-mail)

No response from Richmond. Why should he respond? By proxy, through the Court's choice of the Absolute Privilege to protect lawyers over the public's constitutional protections, you have extended to all ABA members the same immunity against liability, that this Court enjoys.

Sadly, this Court's immunity is the same or better immunity that courts apply to shield the

cops like those who ‘officially’ slaughtered Brianna Taylor with bullets recently in Louisville, Kentucky for the ‘crime’ of sleeping in her own bed, in her own home, at nighttime.

The Court’s recent June 5, 2020 letter to “Fellow Alaskans” promised to:

“... provide an accessible and impartial forum for the just resolution of all cases.” (Exh. 4, Supreme Court Letter (June 5, 2020) to “Fellow Alaskans”)

When? How can there be an impartial forum if a litigant who hires one of your ABA colleagues is allowed to commit crimes under ‘color of law’ to influence and frighten witnesses, alter official public record, perjure for profit, and otherwise influence the outcome of litigation with criminal offenses?

If this promise by the Supreme Court is anything but another PR stunt and your apology to minorities who are getting ground up in the Pay-to-Play ‘legal system’ you oversee is actually genuine, your letter is a good first baby step toward restoring public trust in the courts.

However, real service to the public by the Court’s actions must quickly follow the promises in the Court’s unsigned letter before any real trust or credibility will develop.

In this case, treating an Officer of the Court, Waggoner’s, perjury and theft by deception under the same standards that the Court applies to a non-lawyer suspect or defendant for the same crimes, would be a good second baby step in this process.

Further, the Court promised in their letter to Fellow Alaskans:

“We commit ourselves and the court system to seek always to ensure equal justice under the law.”

Again, when? It will serve as an example to the Courts you oversee, if this Court would also actually commit to this promise you made to the public in your letter. Maybe then the lower

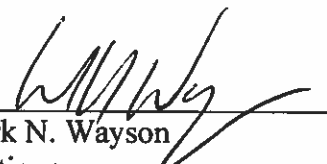
Courts will begin to return to primarily serving the public as public servants, and stop primarily servicing their colleagues in the lawyer-insurance industry. That industry will be hard to dismantle. It is now a not-so-well-disguised, but highly profitable, racketeering scheme under color of law. The return to a system based on justice will be a big blow to the economy.

Ordering a criminal investigation of Waggoner for committing crimes in the 'impartial forum' of your Court is not a tough decision to make. You have evidence in your file. Waggoner has supplied more evidence in his Attorney Fees billing records. The Supreme Court actually witnessed crimes committed in and through your court with impunity by Waggoner. No prosecutor could dream of better witnesses.

This decision does not need months or years of pondering in any Ivory Tower.

Wayson, not as a minority, but Wayson, as a normal, heterosexual, moral, ethical Caucasian human being, type 'Fellow Alaskan', nevertheless requests that this Court ethically and expediently do the job that the public has entrusted you to do, within the constitutional and statutory blueprints in place to guide you and that you must respect to ensure equal justice for all.

DATED this 15 day of June, 2020.

  
\_\_\_\_\_  
Mark N. Wayson  
Petitioner

I certify that this document was distributed via  
U.S. Postal Service to: the Alaska Supreme Court  
and to the Law Offices of Paul Waggoner  
on this 15 day of June, 2020  
By Petitioner Mark N Wayson



Case. No. S-17270. **Stevenson v. Wayson** MOTION FOR THIS COURT TO ORDER A CRIMINAL INVESTIGATION OF PAUL W. WAGGONER FOR PERJURY AND THEFT BY DECEPTION

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markonwayson@yahoo.com

IN THE SUPREME COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT

MARK N. WAYSON,	)	
	)	
Petitioner	)	
	)	No. S-17270
v.	)	
	)	
WILLIAM E. STEVENSON,	)	
	)	
Respondent	)	
_____	)	

**ALASKA SUPREME COURT ORDER**

IT IS HEREBY ORDERED that \_\_\_\_\_ initiate a criminal investigation of Paul W. Waggoner for perjury and the theft of monies obtained by Mr. Waggoner as a direct result of the perjury that he committed.

This ORDER is based upon compelling evidence and probable cause of perjury and the theft of monies by Mr. Waggoner that is found in this Court's record of Mr. Waggoner's Opposition to Mark N. Wayson's Interlocutory Petition for Review to this Court under Case No. S-17270.

Additional evidence of the theft of monies by Mr. Waggoner is to be found in the Attorney Fees billing records of the Richmond & Quinn Law Firm in Anchorage Alaska.

In addition to the damage done to Mr. Wayson, the indignity of perjury committed using Alaska's highest Court as the forum for this crime, results in unacceptable damage to the dignity, professionalism, integrity and impartiality of this Court, and the integrity of the entire Justice system, that the Supreme Court has committed to being an accessible and impartial forum provided to all Alaskans in order to ensure equal justice under the law.

IT IS ORDERED that this criminal investigation be opened immediately and be prioritized as much as possible.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

---

JUSTICE

I certify that this document was distributed via  
U.S. Postal Service to: the Supreme Court,  
The Law Offices of Paul Waggoner  
on this 15 day of June, 2020  
by Petitioner Mark N Wayson.





### EXHIBIT LIST

- Exh. 1. Alaska Bar Association sworn oath to become an officer of the Court
- Exh. 2. Fraudulent billing records by Paul Waggoner of Richmond & Quinn. (pp. 054, 055, December 21, 2018 Richmond & Quinn Attorney Fees billing records, and p. 057, January 17, 2019 Attorney Fees billing records.)
- Exh. 3. Five unanswered E-mails from Wayson to Robert Richmond of Richmond & Quinn law firm, requesting information about fraudulent billing by Paul Waggoner and information regarding a false police report filed by their client.
- Exh. 4. Copy of June 5, 2020 letter to "Fellow Alaskans" from the Alaska Supreme Court

## ALASKA BAR ASSOCIATION OATH

**Section 3.** Upon receiving certification of the eligibility of an applicant, any state or federal judicial officer may enter an order admitting the applicant as an attorney at law in all the courts of the state and to membership in the Alaska Bar Association. Each applicant ordered admitted to the practice of law shall take the following oath before any state or federal judicial officer:

I do affirm:

I will support the Constitution of the United States and the Constitution of the State of Alaska;

I will adhere to the Rules of Professional Conduct in my dealings with clients, judicial officers, attorneys, and all other persons;

I will maintain the respect due to courts of justice and judicial officers;

I will not counsel or maintain any proceedings that I believe are taken in bad faith or any defense that I do not believe is honestly debatable under the law of the land;

I will be truthful and honorable in the causes entrusted to me, and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidences and preserve inviolate the secrets of my client, and will not accept compensation in connection with my client's business except from my client or with my client's knowledge or approval;

I will be candid, fair, and courteous before the court and with other attorneys, and will advance no fact prejudicial to the honor or reputation of a party or witness, unless I am required to do so in order to obtain justice for my client;

I will uphold the honor and maintain the dignity of the profession, and will strive to improve both the law and the administration of justice.

A certificate of admission shall thereupon be issued to the applicant by the clerk of the court.

(Added by SCO 161 effective immediately; amended by SCO 346 effective April 1, 1979; by SCO 392 effective January 1, 1980; by SCO 402 effective May 1, 1980; and by SCO 504(4) effective June 1, 1982; by SCO 971 effective July 15, 1989; by SCO 1083 effective January 15, 1992; by SCO 1087 effective January 15, 1992; by SCO 1146 effective September 9, 1993; by SCO 1148 effective July 15, 1994; by SCO 1153 effective July 15, 1994; by SCO 1229 effective April 12, 1996; by SCO 1378 effective December 16, 1999; by SCO 1380 effective April 15, 2000; and by SCO 1704 effective October 15, 2009)

EXH. 1

**Richmond & Quinn**

360 K Street, Suite 200  
Anchorage, AK 99501  
Phone (907) 276-5727  
Fax (907) 276-2963  
Tax Id 92-0080766  
Phone 907-276-5727  
Tax ID 92-0080766

December 21, 2018

William E. Stevenson  
30820 W Glenn Hwy  
Sutton, AK 99674

Our file# 100 00041 RLR  
Invoice Number: 24116

Stevenson re Wayson  
Adjuster: Curtis Barickman  
Claim No. 1139112

**PROFESSIONAL SERVICES**

11/01/2018	PWW	Draft expert questions for Tim Grier.	0.30 hrs.	82.50
11/01/2018	PWW	Report to client and Stacy re court denial of public expense appeal.	0.20 hrs.	55.00
11/01/2018	PWW	Draft expert questions to fulfill disclosure rules.	3.10 hrs.	852.50
11/01/2018	CKC	Review Order denying Plaintiff's motion for copying the petition for review.	0.10 hrs.	12.50
11/02/2018	PWW	Draft revisions and confer with client on expert report.	0.50 hrs.	137.50
11/02/2018	PWW	Discuss with client modifications to expert questions.	0.70 hrs.	192.50
11/02/2018	PWW	Discuss with Tim Grier historic use of easement and procedure for responding to expert questions.	0.40 hrs.	110.00
11/05/2018	PWW	Confer with Tim Grier re finalizing expert report.	0.20 hrs.	55.00
11/05/2018	PWW	Review and analyze R&M expert report.	0.50 hrs.	137.50
11/05/2018	PWW	Discuss possible depositions and supplementation of expert report with Grier.	0.40 hrs.	110.00
11/05/2018	PWW	Review Wayson's Petition for Review arguments for report to client and insurance attorney- 40 pages.	0.70 hrs.	192.50
11/05/2018	CKC	Work on our Expert Reports Disclosures.	1.40 hrs.	175.00
11/06/2018	CKC	Review Mr. Wayson's three most recent court filings claiming legal bias against him and his 575 page Supreme Court Exhibit List with attachments.	0.80 hrs.	100.00
11/06/2018	CKC	Review photos received from expert Grier.	0.10 hrs.	12.50
11/06/2018	CKC	Work on our Supplement to Expert Report Disclosures in light of additional expert	0.70 hrs.	87.50

054

EXH. 2

P. 1

100	R & Q Misc	Invoice# 16	Page 2
		documents received from Mr. Grier.	
11/07/2018	PWW	Research and draft opposition to Motion to Strike.	0.80 hrs. 220.00
11/08/2018	CKC	Review Notice received from the Court in response to Plaintiffs Petition for Review of the Judge's October 10, 2018 Order.	0.10 hrs. 12.50
11/14/2018	PWW	Review Wayson's email cancelling his expert's deposition.	0.10 hrs. 27.50
11/14/2018	PWW	Report to client re Beardsley's cancellation of deposition.	0.20 hrs. 55.00
11/14/2018	PWW	Draft report to client on Bennett and Beardsley.	0.20 hrs. 55.00
11/14/2018	PWW	Discuss with John Bennett Beardsley cancelling deposition and Bennett's future role in the case.	0.40 hrs. 110.00
11/14/2018	PWW	Discuss case developments with Tim Grier.	0.20 hrs. 55.00
11/14/2018	PWW	Review order from Supreme Court denying motion to strike.	0.10 hrs. 27.50
11/14/2018	PWW	Analyze and report on Supreme Court denial of Motion to Strike.	0.40 hrs. 110.00
11/14/2018	PWW	Analyze the timing and motions that Wayson is making in his Petition for Review by reviewing 6 months of pleadings.	2.20 hrs. 605.00
11/15/2018	PWW	Review and respond to client re Supreme Court pleadings.	0.40 hrs. 110.00
11/15/2018	PWW	Research and draft opposition to Petition for Review.	6.50 hrs. 1,787.50
11/15/2018	PWW	Revise opposition to Petition for Review.	1.00 hrs. 275.00
11/18/2018	PWW	Communicate with client re Petition for Review and pending issues.	0.20 hrs. 55.00
11/29/2018	PWW	Communicate with Philadelphia Insurance attorney office re payment of charges.	0.50 hrs. 137.50
			\$5,955.00
		<u>EXPENSES</u>	
11/30/2018	E101 Copying (.10 per page)		2.40
11/30/2018	E101 Copying (.10 per page)		18.30
			\$20.70
		<u>Billing Summary</u>	
Cobb, Cindy K	3.20 hrs	125.00 /hr	\$400.00

## Richmond & Quinn

360 K Street, Suite 200  
Anchorage, AK 99501  
Phone (907) 276-5727  
Fax (907) 276-2953  
Tax Id 92-0080766  
Phone 907-276-5727  
Tax ID 92-0080766

January 17, 2019

William E. Stevenson  
30820 W Glenn Hwy  
Sutton, AK 99674

Our file# 100 00041 PWW  
Invoice Number: 24224

Stevenson re Wayson  
Adjuster: Curtis Barickman  
Claim No. 1139112

### PROFESSIONAL SERVICES

12/03/2018	PWW	Confer with Tim Grier re lack of earthquake damage.	0.30 hrs.	82.50
12/03/2018	PWW	Confer with Bill Stevenson re lack of earthquake damage.	0.20 hrs.	55.00
12/03/2018	PWW	Call Rosner re failure to defend by Philadelphia.	0.20 hrs.	55.00
12/03/2018	PWW	Draft email to Rosner and Barickman re failure of Philadelphia to defend.	0.40 hrs.	110.00
12/05/2018	CKC	Review our Supplemental Report from expert Grier re recent earthquake impact on subject land.	0.10 hrs.	12.50
12/06/2018	PWW	Revise supplemental disclosures concerning post earthquake inspection.	0.20 hrs.	55.00
12/06/2018	CKC	Review Supreme Court Order denying Plaintiff's October 23, 2018 petition for review of Superior Court Order.	0.10 hrs.	12.50
12/07/2018	PWW	Review and report on denial of Petition For Review.	0.20 hrs.	55.00
12/07/2018	PWW	Report on supplemental expert opinion on rock stability based on lack of damage from earthquake.	0.30 hrs.	82.50
12/09/2018	PWW	Review pleadings and Court's orders from 2017 re defamation claim- about 150 pages.	1.00 hrs.	275.00
12/09/2018	PWW	Review Rest. Torts 2nd. 586-587 re privilege, defamation, and litigation.	0.70 hrs.	192.50
12/10/2018	PWW	Review and analyze cases on vicarious liability of client or employer of attorney for	1.80 hrs.	495.00

057

Exh. 2

P. 3

Ethics

Yahoo/Sent

mark wayson <markonwayson@yahoo.com>

To: Robert L. Richmond

Cc: Wanda Huber

Mon, Jun 1 at 8:27 AM

Rob Richmond,

June 1, 2020

I called this morning to learn that you are expected in the office today. You haven't replied to my February 24, 2020 E-mail, or the three I sent you on May 18, 2020. Are you going to be able to meet with me? You seemed earnest and serious on Feb. 24<sup>th</sup> when we met, both about offering me employment at Richmond & Quinn, and about doing what you could to resolve this case. Can you get back to me as soon as possible? This is a very important matter.

My primary concern remains getting information to the Court that your client Bill Stevenson provided your firm, of his alleged concerns that I was/am a deadly threat to him, to judges, to witnesses, etc. so I don't get killed by Stevenson acting upon false information that he submitted to the Court and police through his legal counsel(s).

Stevenson obviously wants my land to add to his empire. Stevenson has been preemptively setting up a situation where he would be justified in killing me. There is a connection.

Waggoner introduced my June 20, 2017 deposition in Court. ( pp. 141-142 attached.) I testified that my neighbor, Rex Close, a witness who died before trial, told me that years before Mr. Close had ever met me, Stevenson had spontaneously informed Mr. Close that I was 'dangerous and suffering from PTSD'. Neither Stevenson nor counsel(s) ever refuted this. Poor Rex was so apologetic that he had believed Stevenson once we became friends.

This event, coupled with Stevenson's March 7, 2017 complaint to the Troopers, (I'm sure you have it, but I will attach it also.) His March 29, 2017 Complaint he filed, and then his November 15, 2017 Terroristic Threats, demonstrate a pattern that a village idiot, let alone Waggoner, could recognize the connection between events, and one that an ethical attorney would report to law enforcement under Rule 503, re: the Attorney-client Privilege.

Among other irregularities, ethically and legally, I also have concerns for your firm billing Stevenson's insurance company for Waggoner's efforts on behalf of Chadwick McGrady, and your firm billing Stevenson for Waggoner to represent Ms. Farley in her beef with Stevenson's insurance company.

Under ethics law, I found you advertised your firm as one of those. Is that correct?

EXH. 3

p. 1

"Compare the best *Ethics lawyers* near Anchorage, AK today. Use our free directory to instantly connect with verified *Ethics attorneys*. ... *Richmond & Quinn*."

Do you have the '*best Ethics Lawyers in Anchorage*? Is there an ethics attorney at Richmond & Quinn who you can consult re: Waggoner's billing and discovery breeches?

At this stage it is obvious this case is headed for appeal in this 'Pay to Play' court system. Nevertheless, it is important to attempt to resolve conflicts before appealing. This is my intent for requesting your legal and ethical review of your client's and Waggoner's conduct which has placed me in reasonable fear for my life, and corrupted this civil case completely.

Please get back to me.

Mark

Download all attachments as a zip file

•

•

6-20-17 Wayson dep. pp. 141-142.pdf  
900.8kB

•

5-4-20 re 3-7-17 AST incident report.pdf  
102.2kB

More Attorney Fee information.  
Yahoo/Sent

mark wayson <markonwayson@yahoo.com>

To: Robert L. Richmond  
Bcc: Wanda Huber  
Mon, May 18 at 6:38 PM  
Rob Richmond,

Here is another piece of the billing puzzle. I'm forwarding Stacy Walker's Attorney Fees billings that were all billed to your client Stevenson. I was told that the McGrady bills were run through your office as well as sent to Stevenson's insurance company. Is that correct?

There was an original and two or three corrected copies, one because of disallowed charges and another for \$1454.00 double-billed to Stevenson for another case. In each version Stacy Walker listed "William Stevenson" as the "claimant."

I know these are paid out monthly by the insurance companies, but when I inquired about returning the overcharges, I was met with stonewalling. Anyway, all three versions of the bill were sent, and each shows your client as being billed for McGrady's third-party defense.

Waggoner, your 'star' of the Richmond & Quinn show according to Quinn, is apparently fibbing a little to Judge Matthews in a 5-13-20 filing in saying that McGrady's bills, "would have been paid by McGrady's malpractice insurance, ALPS, ..." but it makes one wonder if maybe the bills were also paid by ALPS as well as Philadelphia Insurance Companies.

I have to be in Anchorage at 11.a.m. on Wednesday, May 20th. I have some other matters to take care of, but if you have some time after noon, I can rearrange things and come (masked) by your office if it would be helpful in sorting this out.

Sincerely,

Mark Wayson

----- Forwarded Message -----

**From:** Alex Haar <alex@walkereakes.com>  
**To:** 'mark wayson' <markonwayson@yahoo.com>  
**Sent:** Monday, July 8, 2019, 5:47:34 PM AKDT  
**Subject:** Filings

EXH. 3

p. 3



Mr. Wayson:

Attached are courtesy copies of the documents filed this afternoon. A hard copy will follow by mail.

Thank you,

Alex C. Haar

Walker & Eakes

329 F Street, Suite 200

Anchorage, AK 99501

(907) 272-9290

2019-07-08 Motion for Fees - USDC Doc 57.pdf  
111.4kB

• •

2019-07-08 Motion for Costs - USDC Doc 59.pdf  
93.5kB

• •

2019-07-08 Aff of SAS - USDC Doc 58-1.pdf  
826.5kB

2019-07-08 Aff of SAS - USDC Doc 58.pdf

180.2kB

•

• • •

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Waggoner billing  
Yahoo/Sent

mark wayson <markonwayson@yahoo.com>

To: Robert L. Richmond  
Bcc: Wanda Huber  
Mon, May 18 at 12:14 PM  
Rob Richmond,

Here is my opposition to the Waggoner Attorney Fees motion, and Waggoner's Reply to that opposition.

Sorry I don't have the technical capability to scan in my exhibits, but most, if not all, are in your files. If you can't find something specific, please let me know and I will get it to you.

Thanks,

Mark Wayson  
[Download all attachments as a zip file](#)

[4-27-20 Opp. to Stevenson Attorney fees.docx](#)  
[69.2kB](#)

[5-13-20 Wag Reply to Opp to fees.pdf](#)  
[2.9MB](#)

Fw: 3AN-17-05729CI  
Yahoo/Sent

mark wayson <markonwayson@yahoo.com>

To: Robert L. Richmond  
Bcc: Wanda Huber  
Mon, May 18 at 11:57 AM  
Mr. Rob Richmond,

I was quite serious about obtaining more information about what Bill Stevenson told Dan Quinn on the dates of the billings I cited in my 4-27-20 E-mail to you. Could you please look into this as my physical safety is truly at stake here. This fact would waive the attorney-client privilege for Quinn. Ethically, I hope Mr. Quinn can man-up and do the right thing.

Some statements Stevenson made to the State Troopers on March 7, 2017, signal a possible agenda of deadly force against me, that cannot be ignored. And of course he had counsel at the time that he made the allegations against me that he anticipated would require deadly force by him. However this police report was never discovered to me by Chadwick McGrady or by your firm.

As the head of the office, could you also review Waggoner's Attorney Fees billing that I have forwarded here. I think you are going to see some of the 'irregularities' billed out of your office that I was able to detect.

Since this is bulky, I will send you my Opposition to Waggoner's fees that might help in your review following this E-mail. I will also attach Waggoner's Reply to my Opposition in my next E-mail today.

I was surprised at the way Waggoner took you down in his reply to the Court. (p. 4)

Anyway, please get back to me when you have had the chance to look this billing over.

Sincerely,

Mark Wayson

----- Forwarded Message -----

**From:** Paul Waggoner <paul@paulwaggonerlaw.com>  
**To:** ANC\_civil@courtsAK.us <ANC\_civil@courtsAK.us>; mark wayson <markonwayson@yahoo.com>  
**Cc:** Paul Waggoner <paul@paulwaggonerlaw.com>  
**Sent:** Monday, April 20, 2020, 4:49:05 PM AKDT  
**Subject:** 3AN-17-05729CI

EXH. 3

P. 6

Attorney Paul W. Waggoner

3AN-17-05729CI Stevenson v. Wayson

7 attachments: 1. Stevenson's Motion for Attorney Fees; Exhibit A to Motion; Exhibit B to Motion; Exhibit C Part 1 to Motion; Exhibit C Part 2 to Motion; Exhibit D to Motion; Exhibit E to Motion.

Total Number of Pages: 91

The Proposed Order for the Motion for Attorney Fees and the Judgment will be sent in the next email with the Cost Bill.

Paul Waggoner

Paul Waggoner Law

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Motion for Attorney Fees.pdf  
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Exhibt A-Motion Attorney Fees.pdf  
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Exhibit B-Motion Attorney Fees.pdf  
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Exhibit C-Part 1-Motion Attorney Fees.pdf  
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Exhibit C-Part 2-Motion Attorney Fees.pdf  
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Exhibit D-Motion Attorney Fees.pdf  
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Exhibit E-Motion Attorney Fees.pdf

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Today's meeting mark wayson <markonwayson@yahoo.com>

Yahoo/Sen

To: Robert L. Richmond

Mon, Feb 24 at 6:30 PM

Rob.

Overall, the meeting today was useful. You have very unusual listening techniques for an attorney, but as you said, you rely upon the interrogation techniques you learned in the Army, where the aim is to get prisoners to say what you want them to say, rather than what they want to say.

I hope you took away from our meeting the understanding that you do have some responsibility for those who work for you; namely Paul Waggoner in this case. I took away that your suggestions for settling the Stevenson case sound good, but impractical at the level of threats and deceit displayed by Stevenson and his lawyers.

You were wise to let Waggoner go, but the 'Mighty Quinn' you refer to, made it clear that it was Waggoner's deceit that made him the 'Star' of your show while he was still there.

When you go home tonight and consider all that you have, you might also reconsider your statement that suing 'your firm would be the worst decision of my life.' Was that warning really a good idea?

Stevenson, through McGrady, made some pretty dangerous terroristic threats on November 15, 2017 that Waggoner was made aware of. (Glad to send you a copy if you haven't seen them)

Those threats put me in, and keep me in reasonable fear of my life upon my own experience and the advice of others. Since November 15, 2017, I have had to take personal security measures which should not be necessary, but continue to be under the circumstances.

I informed Waggoner while he was with your firm of this crime and his ethical responsibility to report the crime by his client. Waggoner's response made it clear that he was okay with your firm's client, Stevenson, threatening my life. His response reflected not only his contempt for someone's life, but the ethics Waggoner displayed pretty much matched the 'Mighty Quinn's' regarding Waggoner's non-stop lies.

If you have an interest in addressing your firm's responsibility for Waggoner's conduct, please let me know. I have to come in again to Anchorage next week and am always willing to listen.

Go airborne! Mark Wayson

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Chambers of  
Joel H. Bolger  
Chief Justice

**Supreme Court**  
State of Alaska

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Fellow Alaskans,

As we watch events unfolding in the aftermath of the death of George Floyd, we are saddened to see again that the ideals on which our society is founded are far from the reality of many people's lives. We recognize that as a court system we must commit ourselves to making these ideals real by once again dedicating our efforts to ensuring that we provide an accessible and impartial forum for the just resolution of all cases.

We recognize that too often African-Americans, Alaska Natives, and other people of color are not treated with the same dignity and respect as white members of our communities. And we recognize that as community members, lawyers, and especially as judicial officers, we must do more to change this reality.

Our country and our state are built upon the principle that all of us are created equal. And our courts are tasked with putting that principle into action by allowing people to seek redress for their grievances with the assurance that they will be heard and treated fairly. When so many members of our community are not heard or are not treated fairly, we must make changes.

As judges we must examine what those changes must be, what biases - both conscious and unconscious - we bring, and how we can improve our justice system so that all who enter may be assured they will receive equal treatment. We must continue our efforts to make our court system and its judges reflect the community that we serve. We look forward to continued progress from the work of our Fairness and Access Commission; our regular meetings with rural communities; and the many outreach programs, such as The Color of Justice, to which the court system and individual judges dedicate time and resources.

As lawyers we must work to improve access to legal assistance for individuals and communities, breaking down barriers that keep so many people in need from having meaningful access to our courts. And we must examine why people of color continue to be incarcerated and punished at rates that far exceed those of white offenders. We must also work to attract more people of color to the practice of law and, ultimately, to judicial careers.

As community members we must work with our neighbors to help heal the raw wounds of racism and history that have been so painfully laid bare. It is only by working together that we can hope to move beyond the pain that is so evident today.

We commit ourselves and the court system to seek always to ensure equal justice under the law. As Dr. Martin Luther King, Jr. so eloquently stated long ago, "Injustice anywhere is a threat to justice everywhere."

Chief Justice Joel H. Bolger  
Justice Daniel E. Winfree

Justice Peter J. Maassen  
Justice Susan M. Carney

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